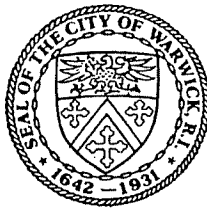


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EXECUTIVE CHAMBER

CITY OF WARWICK



RHODE ISLAND

SCOTT AVEDISIAN
MAYOR

November 7, 2005

Mr. John Silva
Environmental Program Manager
Federal Aviation Administration
New England Region
12 New England Executive Park
Burlington, MA 01803

RE: CITY OF WARWICK - COMMENTS

T. F. Green Airport (PVD)

Purpose and Need Statement Environmental Impact Statement

Draft Technical Memorandum 1, 2 and 3, dated September 15, 2005 drafted by

Vanasse Hangen Brustlin, Inc., (VHB)

Dear Mr. Silva:

Please find enclosed a memorandum that outlines the City of Warwick's recommendations regarding the *Draft Purpose and Need Statement* for the T.F. Green Airport Environmental Impact Statement (EIS).

I urge the Federal Aviation Administration to consider amending the *Draft Purpose and Need Statement* to include all the recommendations and comments attached herewith. The City of Warwick has witnessed a rapid, haphazard growth of the airport facility, which has imposed an unfair burden onto the residents of the host community. Despite years of study and programs, the airport operator has been unable to mitigate many of the airport's negative impacts on our community.

The draft document fails to acknowledge the outstanding issues facing this community and instead sets forth a purpose and need statement that reflects only the desires of the business community. This approach simply furthers the ever-growing divide between those who view the airport as for-profit business and those who must tolerate the airport as a neighbor. I believe the

responsibility of a publicly funded airport should extend beyond the elementary review of financially viability to one of accountability.

I believe incorporating the attached comments and recommendations are necessary to ensure the host community is protected and its voice heard. I would very much appreciate that this be formally recorded as an objection to the draft purpose and need statement.

Thank you for this opportunity to comment.

If there are any questions regarding this matter please feel free to contact Mark Carruolo, Planning Director, at (401) 738-2000, ext. 6296.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Avedisian". The signature is stylized with a large initial "S" and a long horizontal stroke at the end.

Scott Avedisian
Mayor

ATTACHMENT



CITY OF WARWICK
PLANNING DEPARTMENT

CITY HALL ANNEX
3275 POST ROAD
WARWICK, RI 02886-7191

TELEPHONE: 401-738-2000 Ext. 6289
PLANNING FAX: 401-738-2000 Ext. 6285

CD FAX: 401-732-9522
TDD: 401-739-9150

SCOTT AVEDISIAN
Mayor

MARK CARRUOLO
Director

Office of Planning

*Office of Community
Development*

*Office of Landscape
Architecture*

Planning Board

*Warwick Station
Redevelopment Agency*

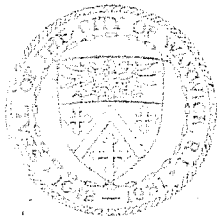
Zoning Board


Conservation Commission


*Harbor Management
Commission*

*Historic District
Commission*

*Historic Cemetery
Commission*



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motion of fair housing
and equal program access
regardless of age, race,
sex, national origin or
physical handicap

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November 7, 2005

Mr. John Silva
FAA
Manager, Environmental Programs
12 New England Executive Park
Burlington, MA 01803

Dear Mr. Silva,

I would like to share some concerns and observations regarding the extremely ambiguous language presented in the T.F. Green Airport "Purpose and Need Statement" as presented to the City of Warwick and its residents at the October 19, 2005 public meeting held at the Buttonwoods Community Center. I am sure that no one would argue that T. F. Green Airport and the City of Warwick present an extremely unique situation regarding the location and relationship of a public commercial regional airport located in the center of a densely populated, primarily residential, suburban/urban community.

Some argue that the airport is an economic generator as well as a convenience for the air traveling public. Others argue that the airport is a burden to the local community producing undesirable by-products, including but not limited to noise, environmental pollution (air, water and noise), increased traffic, reduction of housing stock and tax base, loss of recreation facilities, etc. To some, the benefits outweigh the nuisances and to others the opposite is true. However, few would argue that this situation is not unique. As a result, the common "boiler plate" language presented in the proposed "Purpose and Need Statement" severely misses the mark when it comes to addressing the unique conditions that exist here in Warwick.

First and foremost, the statement "Enhance the efficiency of the airport and the Regional Airport System..." is somewhat disingenuous. This statement in and of itself opens the door for T. F. Green to become something beyond that which even the FAA itself has designated. The FAA has defined T. F. Green as a regional reliever airport and has publicly stated that it desires to improve the efficiency of air travel within the region through the development of a Regional Aviation Plan. If the FAA truly intends to increase the efficiency of air travel in the region by instituting a regional plan the statement should be revised to state, "Enhance the efficiency of the airport within the Regional Airport System..."

This very simple change affirms the status of T. F. Green as a regional reliever airport as designated by the FAA and any improvement to the facility should be presented within the regional context. As a result, any proposed project which expands T. F. Green's facilities beyond its regional designation should be considered as beyond and potentially contrary to the defined "Purpose and Need."

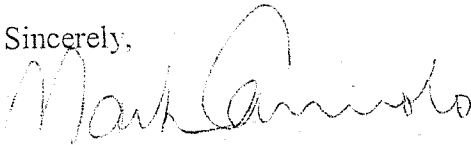
Second, no one will argue that the airport is not geographically constrained. The "Purpose and Need Statement" therefore should reflect the unique conditions and unusual relationship between the City of Warwick and T. F. Green Airport. The City of Warwick requests that the "Purpose and Need Statement" be expanded accordingly to include consideration of Warwick, its residents, neighborhoods and the fragile environmental features surrounding the airport. Language at the end of each purpose statement similar to the following should be included:

"Enhance safety by improving the runway safety areas and taxiways and removing obstructions while minimizing and providing remediation for any potential adverse effects on the surrounding community, including but not limited to increased traffic, environmental pollution, potential loss of housing stock and recreational facilities and reduced tax base."

This type of protective language is customary to public policy, public improvement projects, general laws and development regulations and ordinances; the primary responsibility of any public agency whether local, state or federal is to protect and promote the public health, safety and general welfare of the general public.

If you should have any questions regarding this matter please feel free to contact me at your convenience.

Sincerely,



Mark Carruolo
Planning Director

- c. Mayor Avedisian
Carol Laurie, Vanasse Hangen Brustlin, Inc.



CITY OF WARWICK
PLANNING DEPARTMENT

CITY HALL ANNEX
3275 POST ROAD
WARWICK, RI 02886-7191

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SCOTT A VEDISIAN
Mayor

MARK CARRUOLO
Director

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Conservation Commission

Harbor Management
Commission

Historic District
Commission

Historic Cemetery
Commission

Memorandum

To: Mark Carruollo, Planning Director

From: William J DePasquale, AICP,
Principal Planner

Date: October 4, 2005

Re: Draft Purpose and Need -Environmental Impact Statement
T. F. Green Airport - "Technical Memorandum 1, 2 and 3",
Dated September 15, 2005 drafted by Vanasse Hangen Brustlin, Inc.,
(VHB)

I have reviewed this "draft purpose and need" statement as included within the documents entitled Technical Memorandum 1, 2 and 3 (TM1) drafted by Vanasse Hangen Brustlin, Inc., (VHB) for the T.F. Green Airport (Airport) Environmental Impact Statement (EIS). I submit my evaluation and analysis of the draft documents.

I. The "purpose and need" statements must include language that seeks to balance the concerns of the host community with verifiable air service demands of the future.

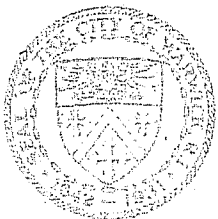
AMEND Chapters 1.2, 1.3, 1.3.1, 1.3.2, 3.1, 3.3, 3.4, 4.1 and 4.6

The draft "purpose and need" is specifically deficient critical verbiage that addresses current and future impacts on the host community, negative impacts that have beset this community for years. Concerns and issues that face the host community have been well documented throughout the Part 150 and Master Plan process but have not been incorporated in this document. Instead, the draft document promotes a runway extension of R5/23 based exclusively on an economic development argument. The limited scope of reasoning used within the "need" statement effectively disregards the well-documented concerns of the City while limiting study of specific alternatives that would pose less of an impact on the host community.

The FAA's own guidance documents establish the principle of balancing community with air service.

"Airports should be compatible with the surrounding communities maintaining a balance between the needs of aviation and the requirements of residents of neighboring areas."

National Plan of Integrated Airport Systems (NPIAS),
in accordance with Section 47103 of Title 49 of United States Code



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The "purpose and need" document as drafted understates existing and potential impact of the airport use on area residents. The focused discourse generally centers on economic development often assisted by color-coded mapping of "incompatibility" suggesting the community is at error for the existing land use condition. Trying to counter this conjecture I suggest the narrative include specific language that elevates the awareness of how the contemporary improvements and airport infrastructure have affected the existing neighborhoods that surround the airport use.

The prevailing rhetoric and enchantment with fiscal bliss desensitize the genuine consequences present within the preferred alternative. This approach trivializes consequence as an impediment to the process removing the human element for decision makers and the public. The draft document should not be configured like a marketing plan which only serves to disengage debate within the decision-making process.

The "Purpose and Need" document needs to profile in greater detail the requisite interaction with the existing community as an essential goal or purpose of the EIS study. A clear understanding that the dots placed on a map is not measures of incompatibility but instead are real people and their families attempting to secure the same quality of life as the decision makers that will ultimately determine their future. To obscure this reality in anyway is to deny rational impartial debate on this all important matter that may change the face of this community for generations to come.

As mentioned I suggest including a factual narrative that describes the location of the airport and how it came to be located within the densely populated neighborhoods of the City. The narrative should speak to the baseline condition and recount recent terminal improvements including the failure and consequence of past forecasting. The document should present a clear balanced understanding of the airport and it's relationship and impact on the community without censoring the nuisances that are common to all airports.

A candid discussion of constraints faced by the airport use within the densely populated urban community must be openly discussed and factored into the "purpose and needs" statement. I also recommend amending the language to recognize the landuse constraints of the airport and the need to balance improvements within the context of the surrounding community. The facts would temper the singular issue of economic benefit in achieving a defined "need" that is far greater than the simple need of maximizing flights to the West Coast.

II. The “purpose” statement must be amended to include existing and future health risk and environmental consequence.

AMEND Chapters 1.1, 1.2, 1.3, 2.1, 4.1, 4.5.4 and 4.6.

The environmental impacts of the preferred alternative presented within the “need” statement underestimates the adverse impact the preferred alternative would have on the City’s environmental resources and air quality. The assessment of human health risk must be clearly stated within the “purpose” statement as a primary factor in alternative selection. Despite the mitigation measures offered for the preferred alternative significant human health, impacts are unacceptable to the City. In my view, I believe that environmental consideration should be an essential part of drafting the “purpose” statement to comply with the core principle of the National Environmental Policy Act (NEPA) “to protect and enhance the natural environment.”

The “purpose and need” document must be amended to include language that assures directed study and promotion of project alternatives that have the least short term and cumulative impact on the air quality and natural resources of the City.

Contrary to the economic development argument advocated within the draft “purpose and need” document, VHB should include study of the affected environment as a core rationale in the development of the “need” statement. Furthermore, the document must include within it’s reasoning of “need” the requirement that the selected action is one that poses the least impact on air quality effecting humans; water quality degradation, habitat loss, loss of biological diversity and loss of fish and wildlife systems.

III. The “purpose and need” statement must classify the selected alternatives as either a “desired” or a “required” action.

AMEND Chapters 3.1,3.2,3.3,3.4,4.1,4.2,4.3,4.4,4.5 and 4.6

Analysis and assessment of preferred alternatives require sophisticated review and an independent understanding of the selected alternative’s impact on the community. The tolerance of impact and mitigation is directly related to the benefit derived from the proposed action. The document seems to group the main runway 5/23 extension with more legitimate pressing concerns such as safety areas on 16/34, taxiway separation, terminal area requirements, gates and on-field infrastructure. The intermingling of all actions effectively removes the gradation between measures elevating the 5/23 lengthening to the level of importance of public safety.

Sorting all proposed actions into two separate activities would help in analyzing the proposed actions. Activities that are “required” because of a demonstrated need for public safety and actions that are “desired” to improve, increase or stimulate economic activity.

As an example, projects such as taxiway separation and safety roll-off areas would be considered "required" activities while the extension of R5/23 to 9,500 feet would be considered a "desired" activity because its primary purpose is to accommodate new service.

Review of actions in this manner would aid in impact analysis creating a hierarchy of study. Environmental impacts associated with "desired" activities would maintain a higher burden than actions "required" for public safety.

IV. The "purpose" statement should encourage less costly (fiscal and environmental) alternatives to the preferred alternative to lengthening of runway 5/23.

AMEND Chapters 3.1, 3.2, 3.3, 3.4, 4.1, 4.2, 4.3, 4.4 and 4.6.

The document must acknowledge the differing costs and impacts associated with carrying out the preferred alternative (runway extension 5/23). The purpose of the document must include language that "explores an array of alternatives" available to meet the aviation demand in a way that is balanced with the host community.. The "need" to maintain a healthy and stable host community must be mentioned in the document as a primary goal. The "purpose" segment of the document should encourage review and study of less costly improvement aimed at improving overall airport efficiency of the airport in the alternative.

In comparing the preferred alternative (runway extension) with the option of improved management and terminal improvements, the purpose statement should clearly reflect the advantages of cost, impact and time requirements for each alternative. The "purpose and need" should contain language that accepts multiple alternate actions that when taken together provide significant efficiency improvements increasing operational capacity at T.F. Green Airport.

The documents must include statements that further considerations for future changes in fleet mix and innovations within the aerospace industry. Flight management technology should also be recognized as a measure to address the outstanding concerns facing the Airport as well as the fact that aircraft manufactures and technology will continue to play a large role in addressing air capacity demands of the future.

V. The draft “purpose and need” must clarify the intended role of T. F. Green Airport and projected international service.

AMEND Chapters 1.3 ,1.3 .1 ,1.3.2 ,1.3.3 ,2..2, 2..3, and 2.4

The City supports specific language in the purpose statement that clearly designates the intent of the Federal Aviation Administration (FAA) and Rhode Island Airport Corporation (RIAC) for T.F. Green Airport to remain as medium-hub regional airport. Recent statements from FAA officials and the extensive discussion regarding non-stop service to London, England has elevated the possibility that the role of T.F. Green Airport could change. At the public hearing held on October 19, 2005 at the Buttonwoods Senior Center in Warwick Rhode Island a representative from the FAA concluded that the addition of international flights would not “change” the role of T. F. Green Airport. Mr. Silva of the FAA concluded that the additional international flights as supposed would be nominal and therefore not impact the future role of the facility. This assumption is also accepted within the “purpose and need” document by the consultant VHB. The City is of the opinion that this assumption is inaccurate and should be amended.

The argument that international flights to London would not change the “role” of T. F. Green Airport in the future is entirely opposite of the methodology used within the purpose and need document to justify the 5/23 runway extension. In particular the need as described through the efficiency statements within the draft document require a longer runway to serve “unmet demand” for non-stop service to the West Coast. This methodology supposes an increase in operations to meet this speculative demand. Conversely, when questioned as to the longer runway’s impact on international service the FAA official quickly dismissed the adopted methodology in favor of a conclusion that International service would have little impact on operations or the role of T.F. Green Airport.

The FAA and consultant (VHB) need only to look at the immediate past to realize the inaccuracy of this assessment. In fact, recent history proves that a new entrant to the low cost market can disrupt events of even the most optimistic forecasts. Case in point, the terminal improvements at T. F. Green Airport in the 1990’s provided the attractive infrastructure for Southwest Airlines to provide low cost service at T. F. Green Airport.

Similarly, a runway length of 9,500 feet would be attractive for whole new market focused on low-cost carrier (LCC) service to the international market. As industry experts discounted the effectiveness of the low cost carriers in the 1990’s statements minimizing LCC service to international markets would be equally as erroneous. For this reason VHB and FAA must be amended the accurately reflect the errors of past market assessments and legitimize the possibility that startup service by LCC serving the international market could not be impeded and in fact could change to role and impact of T.F. Green Airport.

The document should be amended to include language that describes the potential impact on International travel on the legacy airlines. It is understood that the legacy airlines depend on international business travel as one of the only remaining high margin areas of their business. Providing a 9,500-foot runway in the T.F. Green Airport catchment area would serve to increase the probability that low cost carriers will enter the international market in the same way that Southwest Airlines entered the domestic market.

As implied within the draft document (corroborated at the public hearing) it is impossible for FAA or VHB to conclude that a longer runway (5/23) would have limited impact on the role of T.F. Green Airport. The reality that FAA or RIAC cannot prohibit upstart service from entering T.F. Green Airport and would place on the City of Warwick an uncertain future with the potential of unexpected traffic gains such as those that occurred when Southwest Airlines entered the marketplace in 1996.

VI. The “purpose and need” document directs a methodology that is at odds with itself.

AMEND Chapters 1.3, 2.1.1, 1.3.1, 2.4, 3.3.5 and 3.4

The FAA response and VHB forecast for international flights to London assumes limited international flights but also suggests that the 5/23 runway extension is needed to accommodate anticipated growth in non-stop service to the West Coast. If growth is an expected outcome for the extension of the main runway as concluded by VHB, why is new LCC air service to the international community discounted?

According to statements made by VHB, one would believe that the west coast is not “served” by T.F. Green Airport. This misleading statement appears to be an apparent attempt to justify the non-stop West Coast service. The fact is many west coast cities are “served” today through connection. This misrepresentation of the facts must be clarified along with the maps depicting air service routes to the west coast. I recommend wholesale change in the narrative including all cities served by one or two stop connecting flights. The figures and mapping should also depict the cities served with an appropriate legend.

VII. The draft “purpose and need” document does not adequately define the “need” portion of the argument.

AMEND Chapters 3.1 – 3.4

The “need” statement can best be described as a declaration of “desire” for economic development derived from a “build it and they will come” strategy. The “need” portion of the argument fails to address important concerns of the host community as previously mentioned. The TM 1 document does not go far enough to separate, by importance, the immediate needs of the Airport with that of desired growth based on an assumed condition.

Assumed increases in service destinations do not sufficiently justify the "need" statement. The T.F. Green Master Plan acknowledges that the existing runway length has the ability to accommodate the forecasted growth in air traffic notwithstanding the potential for increased passenger delay and reduced efficiency.

The flawed needs statement groups together all infrastructure improvements as equal without regard to the said improvements effect on the short, mid and long-term goals of the Airport and the region. The "need" statement mistakenly assumes that extension of Runway 5/23 is required to serve current and forecasted operations compelling an immediate leap to a supposition of need without regard to physical, social or environmental constraints.

I recommend the need statement be expanded to include a discussion of constraints and how the constraints require alternate infrastructure improvements that in aggregate would accomplish the desired efficiency improvements without the need for a longer runway. Improved surface transportation, alternate sites for cargo, additional gates and improved terminal efficiency are less attractive and less costly than the extension of the main runway but would serve the demonstrated deficiencies cited in the Master Plan with less environmental impact. The disparity is one of "need" versus "desire" a characterization absent from the draft purpose and need statement.

Technical memorandum 1 promotes the most costly alternative based on the principle of "If we build it they will come". The overstated air-capacity problem and assumption of new air service advances the predestined conclusion for the extension of runway 5/23 as a primary factor in quantifying the need statement. The TM1 document reads more like marketing or business plan based on assumed conditions and anticipated future market demands.

The document must identify the R5/23 extension proposal as the most costly alternative available and itself may require further infrastructure in the future to support the perceived increase in air service to new markets. Furthermore, the document must explain in detail that economic viability of servicing new non-stop service is entirely dependent and controlled by the airlines with no guarantees that the air service assumed would be a reality.

VIII. The *need* argument outlined within technical memorandum 1 relies on both speculation and assumption in some case assumption based on speculation.

AMEND Chapters 2.1,2.1.1,2.2,2.3.1,2.4,3.1,3.3 and 3.4

The vagueness and assumptions used in preparation of the draft documents are at times hypocritical based on a methodology of speculation. For instance, the perceived demand to West Coast destinations is most often categorized as "not served" when in fact many of the top destinations are served with a layover. To prepare this document with the assumption that the traveling public will choose higher fares to avoid a layover is in fact been proven false in this marketplace.

The purpose and need statement speaks to the issue of “enhancing the efficiency of the airport” subsequently without a detail analysis of alternative solutions steers the discussion to the extension of runway R5/23 as the sole alternative. The speculation involved with this supposition is based on increased number of flights and passengers fostering congestion resulting in further delay and inconvenience for the passenger. Ironically the preferred alternative of runway extension (5/23) itself will as acknowledged by RIAC and VHB “stimulate” growth at an already constrained airport facility.

The speculated improvements in air service will only be subject to congestion outside the fence in the surrounding service area placing a even greater burden and demand on the host community responsible for providing infrastructure, maintenance and public safety. Overwhelming the Airports surrounding support infrastructure and services is a miscalculation of assumption and would result in a reduction of “overall efficiency” and attractiveness of T.F. Green Airport. The assumption that stimulating capacity will not have detrimental impact on landside infrastructure beyond the fence is a fundamental failure of the draft document.

The capacity increases associated with the preferred alternative are assumed within the “purpose and need” statement to be compatible with the host community. This supposition is flawed. The general speculation contained within TM1 is absent the corresponding data that was included within the Airport Master Plan which clearly indicates the surrounding transportation infrastructure is inadequate to meet the future growth in air traffic. Failing engineering performance standards of surrounding infrastructure noted within the Airport Master Plan did not carry through into the “purpose and need” statement as factors for consideration of alternative measures. To ignore this data denies the equilibrium necessary for unbiased review of the preferred alternative.

Furthermore the document even with support of the preferred alternative to extend the main runway fails to observe the consequential cycle of improvements that a longer runway would engender. Wider roadways, intersections, parking areas and ground side support facilities “outside the fence” would all required to support the additional passenger traffic. The costly infrastructure cycle driven by the preferred alternative (extension 5/23) must be articulated within the “purpose and need statement” as a measure that is potentially unsustainable in the community. I suggest the Airport Improvement and Airport Facilities sections of the document include discussion of the potential downside of the 5/23-runway alternative

IX. The Jet Blue Airlines (Jet Blue) reference is at best misleading and at worst is a conscious decision to provide misinformation.

AMEND Chapters 2..1-2..4

The extension argument is primarily based on a persistent reference throughout the document to competition and a perceived loss in new air carrier service at T. F. Green Airport. The repeated reference to the startup service at Logan International Airport by *Jet Blue* is the most notable example. The inference is clear but is entirely inaccurate.

The so called loss of *Jet Blue* service at T.F. Green Airport as mentioned several times within the document may direct one to believe that because T.F. Green airport does not have a longer runway *Jet Blue* instead chose Logan International Airport. The *Jet Blue* reference is at best misleading and at worst a conscious decision to provide misinformation to suggest that the runway and infrastructure is deficient resulting in a loss of air carrier service.

Contrary to this suggestion contained within the draft document TM 1 it is well known and acknowledged by industry professionals that the *Jet Blue* business model seeks alternate airports without the need to compete directly with Southwest Airlines the nations largest low-cost air carrier. The under served LCC market at Logan International Airport simply proved attractive to *Jet Blue Airlines*. The fact that Southwest had been providing service at T. F. Green Airport and Manchester created somewhat of a LCC void at Logan Airport which aided the *Jet Blue* decision to start up service at Logan Airport NOT because the runway and infrastructure was deficient at T. F. Green Airport..

The fact that *Jet Blue* is mentioned at all in the document is perplexing. The reference should mention that not all low-cost carriers (LCC's) operate with the same business model or have the same profitability per passenger.

TM1 must be redrafted to remove all the inferences that *Jet Blue Airlines* was "lost" to Logan International Airport (Logan). In fact the narrative should explain in a clear concise manner and fact that the runway length at T.F. Green Airport had no bearing on the *Jet Blue* decision to locate at Logan International Airport. The narrative should be expanded into a discussion outlining the business philosophy of the low-cost carrier airlines and the legacy airlines attempt to enter the low-cost market.

X. The draft "purpose and need" document must support assertions and assumptions regarding future demand and loss of service.

AMEND Chapters 1.3,1.3.1,1.3.2,1.3.3,2.1-2.4

The arguments presented for runway expansion are based on conjecture, assumption, and speculation. For example, the purpose and need statement speaks to the issue of "enhancing the efficiency of the airport" and immediately promotes the extension of runway R5/23 as the best way to do so without consideration for any alternative measures.

The myriad of assertions relative to future forecasts and loss of service referenced in the document must be supported by specific citation of the study or studies that support the said claim. Of particular concern is the underlining assertion that without a runway extension of R 5/23 T.F. Green Airport will lose market share. This statement does not include an analysis of acceptable delay that will occur during the planning period. The loss of market share alluded to within the document must be justified with a detailed analysis against all other airports that serve the New England market.

The draft document does not explain the reality that most of New England's airports will over the next ten (10) years experience increased delay because of the growing passenger traffic in the region. In all practicality the increase in passenger growth will be applied to all regional airports working uniformly against the idea that T.F. Green will experience a disproportionate decrease in service as a result a congestion resulting in a loss of service. This detail is important to note within the document to balance the premise that without a 9,500 foot runway T.F. Green will lose passenger traffic.

XI. The purpose and need must be expand to include alternative evaluation for the use of the Quonset Airfield as a means of addressing deficiencies in air cargo.

AMEND Chapters 2..3.4,3.3.2,3.4,4.4,4.5.2,4.5.3,4.5.4 and 4.6

During the past Study Resource Committee (SRC) meetings former staff of RIAC pledged that the EIS would discuss the importance of alternative sites as reasonable and less costly means of providing the infrastructure necessary to meet the future air cargo demands of the Airport.

The "*purpose and need*" document TM1 must be expanded to evaluate practicable alternatives. This includes the use of the Quonset airfield in North Kingston as a reasonable alternative to meet the need of future expansion needs of air cargo operations at T.F. Green Airport.

XII. The purpose and need is to narrow and must include discussion of alternatives outside improvements on additional runway length of R5/23.

AMEND Chapters 2.1, 2.4, 3.1, 3.1.1, 3.2, 3.3.1,3.3.5,3.4,4.4 and 4.6

The FAA and VHB must appreciate the maximum capacity of this airport is not determined independent of the surrounding community. RIAC cannot continue to insist on unconstrained growth within the limits of the densely populated urban community. The TM1 document must be amended to include the potential benefits of keeping the current runway configuration with efficiency improvements as an alternative to the preferred runway extension (5/23).

The document should discuss a set of alternative measures including efficiency; management technological improvement designed to maximize the Airport's potential without exceeding the ability of the host community to accommodate the airport landuse.

The goal should not fixate on any single infrastructure improvement but instead should provide all viable means to meet the purpose of the project to provide air service in a manner that is in balance with the surrounding community. The draft document isolates the discussion of alternatives effectively dismissing less costly solutions. In the alternative, I recommended language that integrates the local issues with potential alternative solutions that collectively may produce efficiency gains without the preferred alternative's encroachment on the host community.

The draft Purpose and Need statement should include the following paragraphs in the discussion of the preferred alternative.

"The cumulative effect of the efficiency, technology and management Improvements to air and landside infrastructure maybe a more cost effective way to enhanced capacity and meet future demand manner with significantly less negative impact on the host community."

"The need as described by the proposed action to extend R5/23 is considered a preferred alternative of RIAC as a tool fueled from economic desire and not the only alternative available to meet current and future demand at the airport"

The isolated study of the preferred alternative allows proponents to dismiss options as "...not meeting the purpose and need of the project." The analysis contained in the draft document is prejudiced toward the 5/23 extension without discussion of measured alternatives. The document must clarify the need for the EIS process to compliment the airport with less environmental impact in a more cost-effective manner. The limited focus on the runway extension (R5/23) effectively assures alternatives to runway construction will be deemed incompatible the purpose and need.

A series of capacity enhancing initiatives must be considered as an alternative to the runway build proposal. Efficient use of the existing airfield combined with increases in load efficiency, terminal and roadway improvements would be more cost effective and have less impact on the host community. I recommend all alternatives be considered for their collective contribution in gaining efficiency improvements without the need for the costly preferred alternative (5/23 extension).

XIII. The justification provided for the extension of runway 5/23 relies on speculated demand for new service.

AMEND Chapters 1.3, 1.3.1, 1.3.2, 1.3.3, 2.1, 2.1.1, 2.2, 2.3, 2.3.1, 2.3.2, 2.3.3, 2.4, 3.1- 3.4

The premise that the longer runway would meet "unmet demand" is false because it supposes that the aviation public cannot travel from PVD to the West Coast. The draft document infers that without the implementation of the Proposed Action (extension of 5/23) this unmet demand will be "lost". The LCC traveler places more copious needs such as non-stop service second to that of price. The validation of this reality can be witnessed in the success of the LCC's at T.F. Green and Manchester airports despite the fact that low cost nonstop service to the west coast subsists from Logan Airport. The simple fact is that demand within this marketplace is driven by a combination of low cost and convenience and will not disappear if the runway is not constructed to 9,500 feet. If warranted the demand will be assumed by service via connection. The City is of the opinion that the inference is inaccurate and should be amended.

XIV. The draft “purpose and need statement” is internally conflicted promoting direct competition between airports while supporting a regional airport plan.

AMEND Chapters 1.3, 1.3.1, 1.3.2, 1.3.3, 1.4, 2.1, 2.1.1, 2.2, 2.3, 2.3.1, 2.4, 4.1, 4.4, 4.5, 4.5.1, 4.5.2 and 4.6

The self described need for direct competition cited several times within Technical Memorandum 1 contradicts the arguments in favor of developing a FAA regional aviation plan. Further, the belief that the FAA can rationally adopt a “purpose and need” statement for T.F. Green Airport without a fully completed Regional Aviation Plan is irrational and counterproductive. The draft “purpose and need” does not recognize the necessity to capitalize on the assets of New England’s regional airports.

The purpose and need must address the duplication of air service and division of air service markets the goal of providing infrastructure tailored to the regional airports ability to airport to accommodate said improvements.

The documents presented to date are clearly biased in favor of airport expansion and ignore the various and wide-ranging community concerns that have been presented in numerous public forums throughout the past several years. It is unacceptable that the document does not acknowledge those public concerns and that they have not been factored into the purpose and need statement for the airport.

A public project of this magnitude, with its potential impact on the environment must balance the airport’s needs with the needs of area residents. I am extremely concerned that this draft ‘purpose and need statements’ sets the stage for an EIS that will endorse the most costly project without regard to the environmental consequence. It is an unrealistic expectation that RIAC could propose a public project that meets all the needs and desires of the traveling public without limitation.

T.F. Green Airport is a part on the entire airport system. Individual airports must meet the demand for air transportation within the context and ability of the host community to support the aviation use. Airports should only be developed within the constraints afforded by the host community.

XV. The draft “purpose an need” assumes NO saturation will occur at Logan International Airport.

AMEND Chapters 2.3-2.4

The City of Warwick is of the opinion that this assumption is false constitutes a fatal flaw in the study document. Saturation at Logan International Airport will have an appreciable impact on flight delays increasing the inconvenience at this international airport. The result will be leakage back to the regional airports.

XVI. The public hearing should have made hard copies of the draft document available to the public.